

"The atmosphere of the campus is ideal for learning. It is a very peaceful and screne place to study. At Saint Joseph's College the faculty and staff are fust-class. I would definitely recommend the program to colleagues of mine.

I believe this program will have a positive impact on my career progression. I will have more employment opportunities in administrative and managerial positions than I would have been able to obtain with the MD only."

Sharon Jamie, MD/MHSA student

"I love having a better understanding of how hospital management works and how to deal with the inevitable problems that come up.

I studied virtually every chance I got in the library, and the librarian was always so enthusiastic and helpful. I loved going for runs to the bridge and sticking my feet into the lake. The sunsets over Schago Lake are amazing."

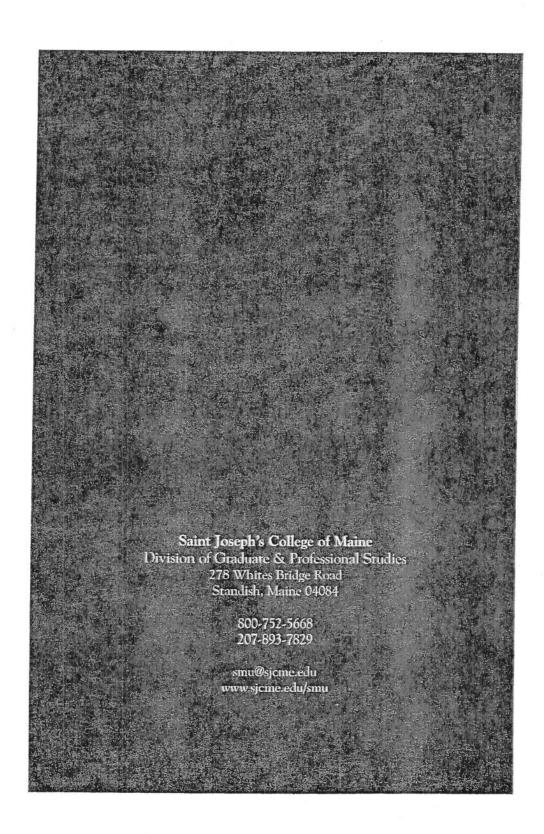
Clay Johnson, MHSA '02

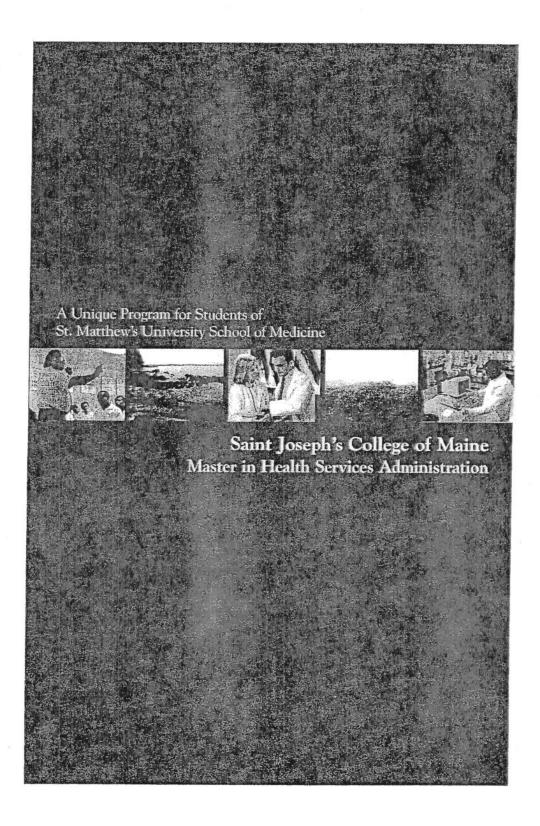
"Saint Joseph's has been a perfect fit for my professional and family life. The curriculum was challenging ... interactive with current topics. Now my family and I are celebrating my recent graduation, as well as my latest promotion."

Tedd Alan Comerford, MHSA '01

"Thank you for your teaching and guidance throughout this course. The material is very applicable and helps to gain a better overview of health care in general."

Maureen Green, MHSA student





Replies and Other Related Documents

2:05-cv-00848-BES-LRL St. Matthew's University v. SABA University

United States District Court

District of Nevada

Notice of Electronic Filing

The following transaction was received from Reinmiller, Nathan entered on 3/20/2006 at 4:17 PM PST and filed on 3/20/2006

Case Name:

St. Matthew's University v. SABA University

Case Number:

2:05-cv-848

Filer:

David L. Frederick

Document Number: 33

Docket Text:

REPLY to Response to [20] MOTION to Dismiss; filed by Defendant David L. Frederick. *Plaintiff's Opposition to Defendant David L. Fredrick's Motion to Dismiss Plaintiff's Amended Complaint* (Reinmiller, Nathan)

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1101333072 [Date=3/20/2006] [FileNumber=3029859-0] [2b8ef14240763787d9a7fb4b64620b0449eaeb6c2517a516d3ed79e802446701cd5 35db89ffb3b563e49058cad742cb221e5ab4e436099fc459b18d03ca20aca]]

2:05-cv-848 Notice will be electronically mailed to:

F. Christopher Austin austinc@gtlaw.com

Ronald D Green, Jr greenro@gtlaw.com

Nathan Reinmiller efile@alversontaylor.com

Mark G Tratos tratosm@gtlaw.com

2:05-cv-848 Notice will be delivered by other means to:

Terri R. Hanley pro hac vice 220 Montgomery Street, Suite 1920 San Francisco, CA 94104

Karl S. Kronenberger

pro hac vice 220 Montgomery Street, Suite 1920 San Francisco, CA 94104

EXHIBIT G

Order To Lift Seal Entered and Signed by the Honorable Lawrence R. Leavitt on March 3, 2006

GREENBERG TRAURIG LLP 1 Mark G. Tratos (Bar No. 1086) F. Christopher Austin (Bar No. 6559) Ronald D. Green, Jr. (Bar No. 7360) 3773 Howard Hughes Parkway, Ste. 500 N Las Vegas, Nevada 89109 Tel: (702) 792-3773 4 Fax: (702) 792-9002 5 **KRONENBERGER & ASSOCIATES** Karl S. Kronenberger (CA Bar No. 226112) (Pro Hac Vice) 6 Terri R. Hanley (CĂ Bàr No. 199811) (Pro Hac Vice) 220 Montgomery Street, Suite 1920 San Francisco, California 94104 Tel: (415) 955-1155 8 Fax: \((415)\) 955-1158 9 Attorneys for Plaintiff 10 **UNITED STATES DISTRICT COURT** 11 **DISTRICT OF NEVADA** 12 13 ST. MATTHEW'S UNIVERSITY 14 Case No. CV-S-05-0848-BES (CAYMAN) LTD., a Cayman Islands 15 company, 16 Plaintiff, **ORDER TO LIFT SEAL** 17 VS. SABA UNIVERSITY SCHOOL OF 18 **CONDITIONALLY UNDER SEAL** MEDICINE FOUNDATION, a Netherland-Antilles company, et al, 19 Defendants. 20 21 22 23 24 25 26 27 28 ORDER TO LIFT SEAL

After consideration upon petition properly made by Plaintiff ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD. in the above-captioned case, and good cause having 2 been found therefore, IT IS HEREBY ORDERED: 3 The Court's "ORDER RE FILING UNDER SEAL," signed on July 15, 2005 and 4 entered on July 19, 2005, is hereby rescinded and the seal pursuant thereto lifted. 5 6 IT IS SO ORDERED. 8 DATED: 9 10 UNITED STATES MAGISTRATE JUDGE 11 12 13 14 15 SUBMITTED: 16 17 Dated: February 3, 2006. KRONENBERGER & ASSOCIATES 18 19 20 Terri R. Hanley Attorneys for Plaintiff ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD. 21 22 GREENBERG TRAURIG, LLP Dated: February 3, 2006. 23 24 By: 25 Mark G. Tratos F. Christopher Austin 26 Ronald D. Green, Jr. Designated Local Counsel for Plaintiff ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD. 27 28

EXHIBIT H

Order For Alternative Service Entered and Signed by the Honorable Lawrence R. Leavitt on March 3, 2006 **GREENBERG TRAURIG LLP** 1 Mark G. Tratos (Bar No. 1086) F. Christopher Austin (Bar No. 6559) 2 Ronald D. Green, Jr. (Bar No. 7360) 3773 Howard Hughes Parkway, Ste. 500 N Las Vegas, Nevada 89109 Tel: (702) 792-3773 4 Fax: (702) 792-9002 5 **KRONENBERGER & ASSOCIATES** Karl S. Kronenberger (CA Bar No. 226112) (Pro Hac Vice) 6 Terri R. Hanley (CA Bar No. 199811) (Pro Hac Vice) 220 Montgomery Street, Suite 1920 7 San Francisco, California 94104 Tel: (415) 955-1155 8 Fax: (415) 955-1158 9 Attorneys for Plaintiff 10 UNITED STATES DISTRICT COURT 11 DISTRICT OF NEVADA 12 13 14 ST. MATTHEW'S UNIVERSITY Case No. CV-S-05-0848-BES (CAYMAN) LTD., a Cayman Islands 15 company, 16 Plaintiff, ORDER FOR ALTERNATIVE SERVICE 17 VS. 18 SABA UNIVERSITY SCHOOL OF **CONDITIONALLY UNDER SEAL** MEDICINE FOUNDATION, a 19 Netherland-Antilles company, et al, 20 Defendants. 21 After consideration upon motion properly made by Plaintiff ST. MATTHEW'S 22 UNIVERSITY (CAYMAN) LTD. ("ST. MATTHEW'S") in the above-captioned case, and 23 good cause having been found therefore, IT IS HEREBY ORDERED: 24 Defendants in the present case Thomas Moore, M.D. a.k.a. 25 1. "presaaimg@hotmail.com" ("MOORE"), Sarah Weinstein a.k.a. 26 "execsecaaimg@hotmail.com" ("WEINSTEIN") and Rachael Silver ("SILVER") may be 27 served with notice of summons pursuant to the provisions of Nevada Rules of Civil 28 [PROPOSED] ORDER FOR ALTERNATIVE SERVICE

Procedure, Rule 4(e)(1), by publication in the Nevada Appeal of Carson City, Nevada for a period of four weeks, at least once a week during said time. The service of summons shall be deemed complete at the expiration of four weeks from the first publication.

- 2. Each of Defendants MOORE, WEINSTEIN and SILVER may be served by delivery of summons to Val-U-Corp Services, Inc. of Carson City, Nevada, as such agent and address was designated for each such Defendant in AAIMG's corporate documents filed with the State of Nevada.
- 3. Each of Defendants MOORE, WEINSTEIN and SILVER may be served by email delivery of summons at both of the email addresses "presaaimg@hotmail.com" and "execsecaaimg@hotmail.com," each of those Defendants having been shown to use those addresses in communication concerning the present case. Service of summons shall be deemed complete upon transmission with no error returned.
- 4. Counsel for Defendant Association of American International Medical School Graduates, Inc. ("AAIMG") Nathan Reinmiller of Alverson, Taylor LLP in Las Vegas, Nevada shall serve as agent for service of process for Defendants MOORE, WEINSTEIN, and SILVER, stated officers of Defendant AAIMG.

The above allowances for service are collective and non-exclusive options.

IT IS SO ORDERED.

DATED: March 3, 2006

UNITED STATES MAGISTRATE JUDGE

1	SUBMITTED:	
2	Dated: February 3, 2006.	KRONENBERGER & ASSOCIATES
3	,	
4		By: 1 / 1 / 2 - 1
5		Karl S. Kronenberger Terri R. Hanley
6		Terri R. Hanley Attorneys for Plaintiff ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.
7		
8	Dated: February 2006.	GREENBERG TRAURIG, LLP
9 10	Baled. 1 estading 2000.	OKELNBERG TRACKIG, EEP
10		Ву:
12		Mark G. Tratos F. Christopher Austin
13		Ronald D. Green, Jr.
14		Designated Local Counsel for Plaintiff \ ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.
15		
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18 ;		
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EXHIBIT I

Case docket (as it appears on PACER) – current as of April 3, 2006

United States District Court District of Nevada (Las Vegas) CIVIL DOCKET FOR CASE #: 2:05-cv-00848-BES-LRL

St. Matthew's University v. SABA University

Assigned to: Judge Brian E. Sandoval

Referred to: Magistrate Judge Lawrence R. Leavitt Cause: 15:1125 Trademark Infringement (Lanham Act)

Jury Demand: Plaintiff

Date Filed: 07/12/2005

Nature of Suit: 320 Assault Libel &

Slander

Jurisdiction: Federal Question

Plaintiff

St. Matthew's University (Cayman) Ltd.

represented by F. Christopher Austin

Greenberg Traurig LLP 3773 Howard Hughes Pkwy

Suite 500 North

Las Vegas, NV 89109-Email: austinc@gtlaw.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Karl S. Kronenberger

pro hac vice

220 Montgomery Street, Suite 1920

San Francisco, CA 94104

415-955-1155

Fax: 415-955-1158 LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Mark G Tratos

Greenberg Traurig LLP 3773 Howard Hughes Pkwy

Suite 500 North

Las Vegas, NV 89109

(702) 792-3773

Fax: (702) 792-9002

Email: tratosm@gtlaw.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

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(702) 792-3773

Fax: (702) 792-9002

Email: greenro@gtlaw.com

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LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Terri R. Hanley

pro hac vice 220 Montgomery Street, Suite 1920 San Francisco, CA 94104

415-955-1155 Fax: 415-955-1155 LEAD ATTORNEY

ATTORNEY TO BE NOTICED

V.

Defendant

Association of American International Medical Graduates, Inc.

represented by Nathan Reinmiller

Alverson Taylor Mortensen, et al 7401 W Charleston Blvd Las Vegas, NV 89117-1401 Email: efile@alversontaylor.com LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Defendant

Pankaj Desai

Defendant

Education Information Consultants, Inc.

Defendant

Education International Consultants, LLC

Defendant

David L. Frederick represented by Nathan Reinmiller

> (See above for address) LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Defendant

Patricia Hough represented by Nathan Reinmiller

> (See above for address) LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Defendant

Medical University of the Americas

4/3/2006 10:45 AM

Defendant

Diedre Moore

Defendant

Thomas Moore

Defendant

Saba University School of Medicine Foundation

Defendant

Rachael E. Silver

Defendant

Sarah B. Weinstein

Date Filed	#	Docket Text	
07/12/2005	1	COMPLAINT by Plf w/jury demand. (FILED SEPARATELY) (Entered: 07/12/2005)	
07/12/2005	2	MOTION FOR MISCELLANEOUS RELIEF (Ex Parte) by P for preservation ord/expedited disc/filing under seal/consolidated hrgs. (nss) FLD SEP (DISPO: GRANTED #6 thru #9 (Entered: 07/12/2005)	
07/12/2005	3	CERTIFICATE OF INTERESTED PARTIES by Plf. (nss) (Entered: 07/12/2005)	
07/12/2005	4	NOTICE OF HEARING Hrng has been set on mtn for TRO on 7/15/05 @ 9 am in Ctrm #7D. cpys dist (Entered: 07/14/2005)	
07/15/2005	5	MISCELLANEOUS HEARING Ct Recorder: Lilia Carter: RE: TRO Hrng; ORD TRO will be granted. P is req to post a \$10,000. (see doc). cpys dist (Entered: 07/18/2005)	
07/18/2005	6	ORDER ORD Until fur ord of this Ct, this mtr shall be under seal. (see doc). cpys dist (Entered: 07/19/2005)	
07/18/2005	7	ORDER ORD re Preservation of Evidence (see doc). cpys dist (Entered: 07/19/2005)	
07/18/2005	8	ORDER ORD Court Directed Order to Preserve Evidence (see doc). cpys dis (Entered: 07/19/2005)	
07/18/2005	9	ORDER ORD for Expedited Discovery (see doc). cpys dist (Entered: 07/19/2005)	
07/19/2005	10	CERTIFICATE OF CASH DEPOSIT by Pltf in the amt of \$10,000.00. (Entered: 07/26/2005)	
08/04/2005	11	ORDER re expedited discovery. (cps dist) (Entered: 08/06/2005)	

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CM/ECF - nvd - District Version 2.05 - Docket Report https://ecf.nvd.uscourts.gov/cgi-bin/DktRpt.pl?986252752814953-L_92... Case 2:06-cv-00052-DBH Document 9-8 Filed 04/04/06 Page 20 of 22 PageID #: 212

08/26/2005	12	MOTION FOR MISCELLANEOUS RELIEF Petition for limited Exception to seal order. ORD attached. (s) (PART 1 OF 2) (Entered: 08/26/2005)	
08/31/2005	13	ORDER that Plf's pet for ltd excetion to seal order (#12) is granted. (cps dist) (PART 2 OF 2) (Entered: 09/01/2005)	
10/28/2005		SUMMONS ISSUED to P (12) (Entered: 10/30/2005)	
10/28/2005	14	AMENDED COMPLAINT w/JD obo P (FLD SEP) (nss) (Entered: 10/30/2005)	
12/06/2005	15	ORDER REASSIGNING CASE. Case reassigned to Judge Brian E. Sandoval for all further proceedings. Judge Robert C. Jones no longer assigned to case. Signed by Judge Philip M. Pro on 12/06/05. (LG,) (Entered: 12/06/2005)	
02/08/2006	<u>16</u>	SEALED MOTION for Alternative Services, and to Unseal Order. by Plaintiff St. Matthew's University (Cayman) Ltd. (AXM,) (Entered: 02/08/2006)	
02/15/2006	<u>17</u>	NOTICE of THREE DAY intent to take default; by Plaintiff St. Matthew's University (Cayman) Ltd. (AXM,) (Entered: 02/15/2006)	
02/15/2006	<u>18</u>	NOTICE of Three Day Intent to take Default on Patricia Hough; by Plaintiff St. Matthew's University (Cayman) Ltd. (AXM,) (Entered: 02/15/2006)	
02/15/2006	<u>19</u>	MOTION to Dismiss claims 2, 3, 5, 6; by Defendants Association of American International Medical Graduates, Inc.,, Patricia Hough. Responses due by 3/5/2006. (AXM,) (Entered: 02/15/2006)	
02/15/2006	<u>20</u>	MOTION to Dismiss Complaint; by Defendant David L. Frederick. Responses due by 3/5/2006. (AXM,) (Entered: 02/15/2006)	
02/15/2006	<u>21</u>	ANSWER to AMENDED Complaint by Defendant Patricia Hough. Certificate of Interested Parties due by 2/25/2006. Discovery Plan due by 4/1/2006.(AXM,) (Entered: 02/15/2006)	
02/15/2006	22	ANSWER to AMENDED Complaint by Defendant Association of American International Medical Graduates, Inc Certificate of Interested Parties due by 2/25/2006. Discovery Plan due by 4/1/2006.(AXM,) (Entered: 02/15/2006)	
02/21/2006	23	MOTION to Substitute Attorney Karl S. Kronenberger of KRONENBERGE HANLEY, LLP instead of Karl S. Kronenberger of KRONENBERGER & ASSOCIATES by Plaintiff St. Matthew's University (Cayman) Ltd (MMM (Entered: 02/22/2006)	
02/21/2006	<u>24</u>	MOTION to Substitute Attorney Terri R. Hanley of KRONENBERGER HANLEY, LLP instead of Terri R. Hanley of KRONENBERGER & ASSOCIATES by Plaintiff St. Matthew's University (Cayman) Ltd (MMM,) (Entered: 02/22/2006)	
02/21/2006	<u>25</u>	CERTIFICATE OF SERVICE by Plaintiff St. Matthew's University (Cayman) Ltd. re <u>24</u> MOTION to Substitute Attorney, <u>23</u> MOTION to Substitute Attorney. (MMM,) (Entered: 02/22/2006)	
03/03/2006	<u>26</u>	ORDER granting 23 Motion to Substitute Attorney. Attorney Karl S. Kronenberger for St. Matthew's University (Cayman) Ltd. added. Signed by Judge Lawrence R. Leavitt on 3/3/06. (AXM,) (Entered: 03/03/2006)	

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03/03/2006	<u>27</u>	ORDER granting 24 Motion to Substitute Attorney. Attorney Terri R. Hanley for St. Matthew's University (Cayman) Ltd. added. Signed by Judge Lawrence R. Leavitt on 3/3/06. (AXM,) (Entered: 03/03/2006)	
03/06/2006	<u>28</u>	ORDER to Unseal Case. Signed by Judge Lawrence R. Leavitt on 3/6/06. (AXM,) (Entered: 03/06/2006)	
03/06/2006	<u>29</u>	ORDER for alternative service. Signed by Judge Lawrence R. Leavitt on 3/6/06. (AXM,) (Entered: 03/06/2006)	
03/20/2006	31	MOTION for Extension of Time <i>IN WHICH TO SERVE FIRST AMENDED COMPLAINT AND SUMMONS</i> by Plaintiff St. Matthew's University (Cayman) Ltd (Attachments: # 1 Proposed Order [Proposed] Order Granting Enlargement of Time)(Green, Ronald) (Entered: 03/20/2006)	
03/20/2006	<u>32</u>	ERROR: Wrong event selected; CORRECTION: Attorney Ronald Green advised to re-file using Summons Returned Executed. (MJZ) (Entered: 03/20/2006)	
03/20/2006	<u>33</u>	REPLY to Response to 20 MOTION to Dismiss; filed by Defendant David L. Frederick. Plaintiff's Opposition to Defendant David L. Fredrick's Motion to Dismiss Plaintiff's Amended Complaint (Reinmiller, Nathan) (Entered: 03/20/2006)	
03/20/2006	<u>34</u>	REPLY to Response to 19 MOTION to Dismiss; filed by Defendants Association of American International Medical Graduates, Inc., Patricia Hough. (Reinmiller, Nathan) (Entered: 03/20/2006)	
03/21/2006	SUMMONS Returned Executed by Plaintiff St. Matthew's University (Cayman) Ltd., Defendants Rachael E. Silver, Sarah B. Weinstein, Diedre Moore, Thomas Moore. Rachael E. Silver served on 3/16/2006, answer du 4/5/2006; Sarah B. Weinstein served on 3/16/2006, answer due 4/5/2006; Diedre Moore served on 3/16/2006, answer due 4/5/2006; Thomas Moore served on 3/16/2006, answer due 4/5/2006. (Attachments: # 1/2 Affidavit Summons of D. Moore# 2/2 Affidavit Summons of R. Silver# 3/2 Affidavit Summons of S. Weinstein# 4/2 Affidavit Summons of T. Moore)(Green, Rote (Entered: 03/21/2006)		
03/23/2006		ERROR: Wrong event selected; CORRECTION: Re-docketed as Proposed Discovery Plan/Scheduling Order by Court. (MJZ) (Entered: 03/23/2006)	
03/23/2006	36	PROPOSED Discovery Plan/Scheduling Order filed by Defendants Rachael E. Silver, Sarah B. Weinstein, Association of American International Medical Graduates, Inc., David L. Frederick, Patricia Hough, Diedre Moore, Thomas Moore, Plaintiff St. Matthew's University (Cayman) Ltd. (MJZ) (Entered: 03/27/2006)	
03/27/2006	<u>37</u>	ORDER re 36 Proposed Discovery Plan/Scheduling Order, filed by David L. Frederick, Diedre Moore, Patricia Hough, Rachael E. Silver, Sarah B. Weinstein, Thomas Moore, Association of American International Medical Graduates, Inc., St. Matthew's University (Cayman) Ltd., Discovery Plan due by 5/12/2006. Signed by Judge Lawrence R. Leavitt on 3/24/06. (AXM,) (Entered: 03/27/2006)	

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03/28/2006	<u>38</u>	NOTICE by Plaintiff St. Matthew's University (Cayman) Ltd. of Related Action Filed by Defendant David L. Fredrick in United States District Court, District of Maine (Case No. 06-CV-00052-DBH) (Green, Ronald) (Entered: 03/28/2006)
03/28/2006	<u>39</u>	SUBPOENA Returned Executed as to Education Information Consultants, Inc (Green, Ronald) (Entered: 03/28/2006)
03/28/2006	SUBPOENA Returned Executed as to Educational International Cons LLC. (Green, Ronald) (Entered: 03/28/2006)	

PACER Service Center						
Transaction Receipt						
04/03/2006 10:21:33						
PACER Login:	kk0184	Client Code:	SMU			
Description:	Docket Report	Search Criteria:	2:05-cv-00848-BES-LRL			
Billable Pages:	3	Cost:	0.24			

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